

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case <b>05-CA-306442</b>	Date Filed <b>11-02-2022</b>

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer <b>Apple, Inc.</b>		b. Tel. No. <b>(b) (6), (b) (7)(C)</b>
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) <b>Towson Town Center, #2180 825 Dulaney Valley Road Towson, MD 21204</b>	e. Employer Representative <b>(b) (6), (b) (7)(C)</b>	g. e-mail <b>(b) (6), (b) (7)(C) @apple.com</b>
		h. Number of workers employed <b>100+</b>
i. Type of Establishment (factory, mine, wholesaler, etc.) <b>Retail store</b>	j. Identify principal product or service <b>Computer electronic product sales and service</b>	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) **(3) and (5)** of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See attached Addendum.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

International Association of Machinists and Aerospace Workers

4a. Address (Street and number, city, state, and ZIP code)  <b>9000 Machinists Place Upper Marlboro, MD 20772</b>	4b. Tel. No. <b>(301) 967-4512</b>
	4c. Cell No.
	4d. Fax No.
	4e. e-mail

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

International Association of Machinists and Aerospace Workers

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

(signature of representative or person making charge)

William H. Haller, Assoc. Gen'l Counsel

(Print/type name and title or office, if any)

Address **9000 Machinists Place, Upper Marlboro, MD 20772**Date **November 2, 2022**Tel. No.  
**(301) 967-4512**

Office, if any, Cell No.

Fax No.

e-mail  
**whaller@iamaw.org****WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **Addendum to Charge**

### **2. Basis of the Charge**

On or about October 12, 2022, press reports appeared that the Employer would be making new and/or improved educational and health benefits available to all of its retail employees nationwide, with the exception of the Union-represented personnel at its Towson store. When the Union received these reports, it contacted the Employer to confirm their veracity and, if true, to request that information about the denied benefits be provided to the Union. The Employer confirmed that the reports were true but refused to provide any information about the benefits to the Union. Inasmuch as the Employer had previously informed the Union and sought its agreement before implementing all previous nationwide changes, and the fact that the October 12th reports came two days prior to a representation election at the Employer's retail store in Oklahoma City, the Employer's action in denying those benefits to the Towson employees was designed to threaten and intimidate its employees from seeking union representation, and to retaliate against those employees who had availed themselves of that right. By subsequently refusing the Union's request for information about those benefits the Employer unlawfully refused to comply with its duty to bargain with the Union in good faith.